

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Southern Division)

ASHLEY ALBERT, et al. Plaintiffs, v. GLOBAL TEL*LINK CORP., et al. Defendants.	Case No. 8:20-CV-1936-PWG
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**STIPULATED MOTION
TO SET BRIEFING SCHEDULE**

COME NOW Plaintiffs Ashley Albert, Ashley Baxter, Karina Jakeway, and Melinda Jabbie (“Plaintiffs”), together with Defendants Global Tel*Link Corp. (“GTL”), Securus Technologies, LLC (“Securus”), and 3CInteractive Corp. (“3CI”) (collectively, “Defendants”), by undersigned counsel, upon this Court’s Letter Order dated July 27, 2020 (ECF No. 31), the conference conducted October 6, 2020, and pursuant to Local Rules 105.2 and 105.9, to

HEREBY STIPULATE and JOINTLY MOVE for an order adopting the following schedule and other parameters for answering or otherwise responding to the complaint in this action, and for briefing any motions filed pursuant to Federal Rule of Civil Procedure 12.

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1. Amendment of pleadings

Plaintiffs have opted to not amend their complaint prior to the filing of Defendants’ motion(s) to dismiss. Plaintiffs advise without stipulation that they otherwise reserve all rights under Federal Rule of Civil Procedure 15.

2. Schedule and page limits for Rule 12 motions

<u>Event</u>	<u>Filed by</u>	<u>Page limit</u>
• All Defendants' responses to complaint	October 30, 2020	50 pgs. combined
• Plaintiffs' opposition(s) to Rule 12 motions	December 18, 2020	50 pgs. combined
• Defendants' replies	January 22, 2021	30 pgs. combined

As to all briefs, any exhibits shall be highlighted to indicate the most relevant material.

Each party shall endeavor to present its arguments as efficiently as practicable within the limits set forth above.

Dated: October 13, 2020

Respectfully submitted,

BY COUNSEL FOR ALL PARTIES, by express written consent:

/s/ Matthew K. Handley

HANDLEY FARAH & ANDERSON PLLC

Matthew K. Handley, Bar No. 18636

Rachel E. Nadas*

777 6th Street, NW, Eleventh Floor

Washington, DC 20001

T: 202.559.2433

F: 844-300-1952

mhandley@hfajustice.com

rnadas@hfajustice.com

George F. Farah

Rebecca P. Chang

81 Prospect Street

Brooklyn, NY 11201

T: 212.477.8090

F: 844-300-1952

gfarah@hfajustice.com

rchang@hfajustice.com

William A. Anderson

4730 Table Mesa Drive

Suite G-200

Boulder, CO 80305

T: 202.559.2433

F: 844-300-1952

wanderson@hfajustice.com

/s/ Jason R. Scherr

MORGAN LEWIS & BOCKIUS, LLP

Jason R. Scherr, Bar No. 25633

1111 Pennsylvania Avenue, NW

Washington, DC 20004

T: 202.739.6000

F: 202.373.6001

jr.scherr@morganlewis.com

Elizabeth Herrington*

77 W. Wacker Drive

Chicago, IL 60601

T: 312.324.1000

F: 312.324.1001

beth.herrington@morganlewis.com

R. Brendan Fee*

1701 Market Street

Philadelphia, PA 19103

T: 215.963.5000

F: 215.963.5001

brendan.fee@morganlewis.com

**COUNSEL FOR DEFENDANT
SECURUS TECHNOLOGIES, LLC**

* * *

**COHEN MILSTEIN SELLERS
& TOLL PLLC**

Benjamin D. Brown
Brent W. Johnson
Robert A. Braun
1100 New York Ave., Suite 500
Washington, DC 20005
T: 202.408.4600
F: 202-408-4699
bbrown@cohenmilstein.com
bjohnson@cohenmilstein.com
rbraun@cohenmilstein.com

Christopher J. Bateman
88 Pine Street, 14th Floor
New York, NY 10005
T: 212.838.7797
F: 212-838-7745
cbateman@cohenmilstein.com

JUSTICE CATALYST LAW, INC.

Benjamin D. Elga*
Kelly Jo Popkin*
81 Prospect Street
Brooklyn, NY 11201
T: 518.732.6703
belga@justicecatalyst.org
kpopkin@justicecatalyst.org

Brian J. Shearer*
Craig L. Briskin*
718 7th St. NW
Washington, DC 20001
T: 518.732.6703
brianshearer@justicecatalyst.org
cbriskin@justicecatalyst.org

HUMAN RIGHTS DEFENSE CENTER

Daniel Marshall*
P.O. Box 1151
Lake Worth, FL 33460
T: 561.360.2523
F: 561-828-8166
dmarshall@hrdc-law.org

**ARNOLD & PORTER KAYE SCHOLER
LLP**

Jonathan I. Gleklen, Bar No. 21350
601 Massachusetts Ave., NW
Washington, DC 20001
T: 202.942.5000
F: 202.942.5999
jonathan.gleklen@arnoldporter.com

C. Scott Lent*
250 West 55th Street
New York, NY 10019-9710
T: 212.836.8000
F: 212.836.8689
scott.lent@arnoldporter.com

**COUNSEL FOR DEFENDANT GLOBAL
TEL*LINK CORP.**

* * *

**STEARNS WEAVER MILLER
WEISSLER ALHADEFF &
SITTERSON, P.A.**

Jay B. Shapiro*
150 West Flagler Street, Suite 2200
Miami, FL 33130
T: 305.789.3229
F: 305.789.2664
jshapiro@stearnsweaver.com

WILLIAMS & CONNOLLY LLP

Jonathan B. Pitt, Bar No. 16086
Colette T. Connor*
725 Twelfth Street, NW
Washington, DC 20005
T: 202.434.5000
F: 202.434.5029
jpitt@wc.com
cconnor@wc.com

**COUNSEL FOR DEFENDANT
3CINTERACTIVE CORP.**

**WASHINGTON LAWYERS'
COMMITTEE FOR CIVIL RIGHTS AND
URBAN AFFAIRS**

Hannah E.M. Lieberman, Bar No. 05456

700 14th St. NW, Ste 400

Washington, DC 20005

T: 202.319.1040

F: 202.319.1010

Hannah_Lieberman@washlaw.org

COUNSEL FOR PLAINTIFFS

* admitted *pro hac vice*

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SO ORDERED this 14th day of October, 2020.

BY THE COURT:

/s/

Hon. Paul W. Grimm, U.S.D.J.